

THE LAW OFFICES OF SEAN M. MAHER, PLLC

March 24, 2022

VIA ECF

Hon. Cathy Seibel
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Ardae Hines*, 22 Cr. 42 (CS)

Dear Judge Seibel:

Application granted. Ms. Greenwood's appointment as Coordinating Discovery Attorney in *USA v. Davis*, 17-CR-364, is hereby extended to *USA v. Hines*, 22-CR-42.

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

3/25/22

On behalf of defendant Ardae Hines, I respectfully write to request that the Court extend its appointment of Emma M. Greenwood, Esq., as Coordinating Discovery Attorney in the matter of *United States v. Skylar Davis et al.*, 17 Cr. 364 (CS), to the instant case.

As was brought up at the last appearance before the Court, Ms. Greenwood was appointed by the Court to be the Coordinating Discovery Attorney in *United States v. Skylar Davis, et al.*, 17 Cr. 364 (CS). The Court's previous appointment order in the *Davis* case is attached as Exhibit A. Mr. Hines previously was prosecuted and convicted in the multi-defendant *Davis* case. I have been informed by the government that the discovery provided in the *Davis* case is applicable to the instant prosecution. In addition, the government will be providing additional discovery that was not a part of the *Davis* productions. After discussions with Ms. Greenwood and the government, I believe that Ms. Greenwood's appointment is warranted and will greatly assist the defense in receiving and organizing the voluminous discovery most expeditiously.

I have conferred with the government concerning the defense's request to have Ms. Greenwood's appointment as Coordinating Discovery Attorney in the *Davis* case extended to the instant matter and have been informed by AUSA Samuel Raymond that the government has no objection to the defense's request.

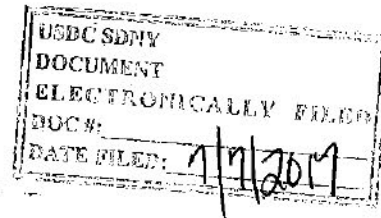
Respectfully submitted,

/S/
Sean M. Maher
Counsel for Ardae Hines

cc: All counsel via ECF

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA, :
 :
 v. :
 :
 SKYLAR DAVIS, et al., :
 :
 Defendants. :

17 Cr. 364 (CS)

~~PROPOSED~~ ORDER

**Order Appointing Emma M. Greenwood, Esquire
As Coordinating Discovery Attorney**

It is hereby **ORDERED** that Emma M. Greenwood is appointed as Coordinating
Discovery Attorney for court-appointed defense counsel.

The Coordinating Discovery Attorney shall oversee any discovery issues that are
common to all of the defendants. Her responsibilities will include:

- Managing and, unless otherwise agreed upon with the Government, distributing global discovery produced by the Government and relevant third party information common to all defendants;
- Assessing the amount and type of case data to determine what types of technology should be evaluated and used so that duplicative costs are avoided and the most efficient and cost-effective methods are identified;
- Acting as a liaison with federal prosecutors to ensure the timely and effective exchange of global discovery;
- Identifying, evaluating, and engaging third-party vendors and other litigation support services;
- Assessing and further identifying any additional vendor support that may be required—including copying, scanning, forensic imaging, data processing, data hosting, trial presentation, and other technology depending on the nature of the case;
- Identifying any additional human resources that may be needed by the individual parties for the organization and substantive review of information;

and

- Providing technological training and support services to the defense teams as a group and individually.

Therefore, the Coordinating Discovery Attorney shall assess the most effective and cost-efficient manner to organize the global discovery with input from defense counsel.

Discovery issues specific to any particular defendant shall be addressed by defense counsel directly with the Government and not through the Coordinating Discovery Attorney. The Coordinating Discovery Attorney's duties do not include providing additional representation services and therefore ^{she} will not be establishing an attorney-client relationship with any of the defendants.

The Government shall provide global discovery to the Coordinating Discovery Attorney unless otherwise agreed. To avoid delay in providing global discovery to defense counsel, any additional global discovery not already produced shall be provided directly to the Coordinating Discovery Attorney, who shall duplicate and distribute the global discovery to all defense counsel. The Government shall work with the Coordinating Discovery Attorney to provide global discovery in a timely manner. Upon request of any individual defense counsel, the Government shall provide global discovery to that defense counsel directly.

The Coordinating Discovery Attorney shall petition this Court, *ex parte*, for funds for outside services and shall monitor all vendor invoices for these services including confirming the work was previously agreed to be performed. However, her time and the time spent by her staff will be paid by the Administrative Office of the U.S. Courts, Defender

Services Office. All petitions for outside services shall include a basis for the requested funds and a determination that the costs of the services are reasonable.

DATED this 7th day of July, 2017.



Hon. Cathy Seibel
U.S. District Court Judge